

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Cassandra Ann Brown, Debtor

**Case No. 22-50712-KMS
CHAPTER 13**

NOTICE

Debtor has filed papers with the court to suspend their bankruptcy payments.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to suspend the payments, or if you want the court to consider your views on the Motion, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Dan M. Russell, Jr. United States Courthouse
2012 15th St., Ste. 244
Gulfport, MS 39501

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Suspend Plan Payments.

Date: May 27, 2025

Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Cassandra Ann Brown, Debtor

**Case No. 22-50712-KMS
CHAPTER 13**

MOTION TO SUSPEND PLAN PAYMENTS

COMES NOW, Debtor, by and through counsel, and moves this Court to suspend their Chapter 13 plan payments, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtor is in need of dental work. The estimated cost for the treatment is approximately \$1,932.00.
3. Debtor is requesting this Honorable Court to suspend any past due plan payments and two (2) months of plan payments, including any ongoing mortgage payments being paid through the plan, during the months of July and August 2025 so those funds will be available to pay for her needed dental treatment.
4. Debtor wishes to resume making plan payments beginning in September 2025.
5. Debtor is requesting that their Chapter 13 plan payments be increased as necessary to compensate for the lost plan payments.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)

Jennifer A Curry Calvillo (MSBN 104367)

The Rollins Law Firm, PLLC

P.O. Box 13767

Jackson, MS 39236

trollins@therollinsfirm.com

601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Suspend Plan Payments was forwarded on May 27, 2025, to:

By Electronic CM/ECF Notice:

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

CASSANDRA ANN BROWN

CASE NO: 22-50712-KMS

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 5/27/2025, I did cause a copy of the following documents, described below,
Notice and Motion to Suspend

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 5/27/2025

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.

Attorney at Law

The Rollins Law Firm

702 W. Pine Street

Hattiesburg, MS 39401

601 500 5533

trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

CASSANDRA ANN BROWN

CASE NO: 22-50712-KMS

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 5/27/2025, a copy of the following documents, described below,

Notice and Motion to Suspend

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 5/27/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 22-50712-KMS
SOUTHERN DISTRICT OF MISSISSIPPI
TUE MAY 27 9-21-27 PST 2025

PRA RECEIVABLES MANAGEMENT LLC
POB 41067
NORFOLK VA 23541-1067

~~EXCLUDE~~

~~(U) SHELLPOINT MORTGAGE SERVICING ATTN
RECOVERY~~

~~EXCLUDE~~

~~(U) TOWER LOAN OF MISSISSIPPI LLC DBA
TOWER LO~~

~~EXCLUDE~~

~~US BANKRUPTCY COURT
DAN M RUSSELL JR US COURTHOUSE
2012 15TH STREET SUITE 244
GULFPORT MS 39501 2036~~

BENNY BROWN
20224 HIGHWAY 613
MOSS POINT MS 39562-9458

CAPITAL ONE
PO BOX 31293
SALT LAKE CITY UT 84131-0293

CREDIT ONE
PO BOX 98872
LAS VEGAS NV 89193-8872

DEPARTMENT OF TREASURY
INTERNAL REVENUE SERVICE
P O BOX 7346
PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVI
CO US ATTORNEY
501 EAST COURT ST
STE 4430
JACKSON MS 39201-5025

MIDLAND CREDIT MANAGEMENT INC
PO BOX 2037
WARREN MI 48090-2037

MIDLAND FUND
320 EAST BIG BEAVER
TROY MI 48083-1238

ONE MAIN FINANCIAL
PO BOX 70918
CHARLOTTE NC 28272-0918

ONEMAIN FINANCIAL GROUP LLC AS
SERVICER FOR
ONEMAIN FINANCIAL ISSUANCE TRUST 2022S1
ONEMAIN
PO BOX 3251
EVANSVILLE IN 47731-3251

PRA RECEIVABLES MANAGEMENT LLC AS
AGENT OF
PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

SHELLPOINT MORTGAGE SE
55 BEATTIE PLACE
GREENVILLE SC 29601-2165

SINGING RIVER FEDERAL CREDIT UNION
6006 HIGHWAY 63
MOSS POINT MS 39563-9534

SINGING RIVER RADIOLOG
1365 MARKET ST
PASCAGOULA MS 39567-6698

SMITH ROUCHON ASSOC
1456 ELLIS AVENUE
JACKSON MS 39204-2204

SOUTHERN FINANCIAL SYS
PO BOX 529
JACKSON MS 39205-0529

(P) TOWER LOAN
P O BOX 320001
FLOWOOD MS 39232-0001

TOWER LOAN OF MISSISSIPPI LLC
PO BOX 320001
FLOWOOD MS 39232-0001

US BANK NATIONAL ASSOCIATION AS
TRUSTEE
MANUFACTURED HOUSING CONTRACT SENIORSUB
SHELLPOINT MORTGAGE SERVICING
P O BOX 19024
GREENVILLE SC 29602-9024

US ATTORNEY GENERAL
US DEPT OF JUSTICE
950 PENNSYLVANIA AVENW
WASHINGTON DC 20530-0001

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6 430
JACKSON MS 39201 5022~~

~~DEBTOR~~

~~CASSANDRA ANN BROWN
20224 HIGHWAY 613
MOSS POINT MS 39562-9458~~

JENNIFER A CURRY CALVILLO
THE ROLLINS LAW FIRM
702 W PINE ST
HATTIESBURG MS 39401-3836

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767~~

~~EXCLUDE~~

~~(P) WARREN A CUNTZ T1 JR
PO BOX 3749
GULFPORT MS 39505-3749~~